

Planning Inspectorate. Botley West Solar Farm Inquiry.

Written (extended) Summary of oral presentation by David J Rogers

Open Floor Hearing 3 Friday 10th October 2025



During the Issue Specific Hearing 2 on the 9th October 2025 we heard a number of times about the mitigation hierarchy in the structured approach to planning to avoid harm to the environment or people; avoid, minimize, compensate, enhance.

Sitting through all the public sessions so far, I feel the applicants have their own mitigation hierarchy to promote the Botley West proposal at this Inquiry: deny, dispute, declare and dissemble.

The first response is to deny certain things need to be considered (i.e. claim they should be scoped out).

Then, if that doesn't work, there is a dispute that they are important.

When they are shown to be important, the applicants declare them not a relevant consideration under the NPPF, the NPS, EN-1 or EN-3 on renewable energy or some other piece of legislation.

Finally, dissembling comes about through promises and claims that are either unlikely to be true or are factually wrong.

Let me give some examples of each.

At an early stage of the application, it was denied that there is any effect of solar farms on local house values. The applicants asked for this effect to be scoped out. It wasn't.

Next, the applicants cherry-picked a single publication from just one author who was unable to show any impact of solar farms on house values; they ignored multiple publications from many other authors demonstrating a significant negative effect on house values up to over one km away.

In the face of such evidence, the applicants then declared that the impact of any local development on house values is not a local planning consideration. In this they are correct. (NSIPs fall under a different set of planning laws, however, and planning blight caused by NSIPs is eligible for compensation.)

So the sequence was deny, dispute, declare. We'll come onto dissembling later.

During the same Issue Specific hearing discussion on Residential Visual Amenity Assessment (RVAA), Inspector Metcalfe, in talking about amenity and glint and glare effects, asked how many houses are within 250 metres of the boundary of Botley West and therefore might be affected. It seems the applicants had never counted them but had estimated that only a handful of houses - about 18 - might be affected in this way. I gave the applicants the information requested by the Inspector more than 18 months ago, because I had counted the number of houses within 100, 200, 300 etc metres and in 100 metre increments right up to 1500 metres from the original Botley West boundaries (using Google Earth imagery) (an analysis and report are here [REDACTED]). The answer to the Inspector's question is an estimated total of 686 dwellings within 250 metres of those boundaries. This should have formed the starting point for deciding how many of them might be affected.

At the end of the glint and glare discussion on 9th October, however, the applicants declared that the separate Appendix on Glint and Glare – commissioned from Pager Power by RPS – does not inform the RVAA because the Report was commissioned for effects on the airport and not on individual properties. This applicant statement is incorrect.

The first paragraph of the Pager Power Report (REP4-012) tells us it was asked to investigate (underline emphasis added):

“the potential impact (of glint and glare) upon road safety, residential amenity, railway infrastructure and operations, and aviation activity associated with Oxford Airport, Oaklands Airfield, Enstone Airfield, RAF Weston-on-the-Green, RAF Abingdon, and RAF Brize Norton.”

So glint and glare effects on residential amenity were assessed by Pager Power.

Indeed, Inspector Metcalfe then went on to point out the Glint and Glare study covered properties up to 1km away (Pager Power’s estimated total of 699 properties included only those with a possibility of being affected, not all properties; REP4-12 p. 30 and Figures 12 to 81) and asked why the applicants had not considered properties at anything like this distance. IP Councillor Westcott for Cumnor Parish Council also asked that the substation should be included in a revised RVAA.

Ignoring both, the applicant then declared that NPPF EN-1 states that *‘it is unlikely that applications will be refused based on RVAA.’*

So, again we had the same hierarchy in play here: deny, dispute, declare.

Quantitative studies suggest that glint and glare are important. Maddison, Ogier and Beltran¹ showed a negative effect of solar farms (as small as 10MW) on house values up to 750 metres away from them, especially pronounced – and highly significant statistically - on the southern side of the solar farms – a directional effect that they attribute to glint and glare (the paper’s summary states a 5.4% reduction in house values up to 750 metres South of solar farms of >5MW capacity. The paper’s Table 5 shows that this reduction almost doubles for solar farms with capacities of >10MW).

Finally, dissembling. The Compulsory Acquisition Hearing on 8th October 2025 included a discussion on the compulsory acquisition of land (CAL) powers being requested by the applicant for the land on which the Botley West solar panels will be built; this appears to involve the potential purchase of the freehold of the land concerned, rather than its leasehold. We were told that such rights are being requested – but will not automatically be applied – in order to ensure the full delivery of the Botley West scheme as a contribution to our Net Zero aims. The applicant said if they do not have these rights they cannot be sure the project will deliver its full stated output of electricity.

As I have previously pointed out (**PDA-007**), the applicant’s documents in some places refer to rental income going to Blenheim from the lease of land for the solar panels, but in other places refer to outright purchase of the freehold of the land by the applicants or their successors – with a very specific sum of £69,150,000 mentioned for the latter in the Funding Statement **APP-022**, p.8. Once the freehold passes to other owners, the land will never revert to agriculture.

¹ Maddison D., Ogier R., & Beltran, A. (2023). The Disamenity Impact of Solar Farms: A Hedonic Analysis. Land Economics, Volume 99, Number 1, February 2023, pp. 1-16.

Consider what is being asked here – the power to purchase land outright just in case any leasehold agreement falls through. From Day 1 of any DCO based on a leasehold arrangement, that risk (of leasehold default) is real. The only way to remove that risk for the next 40+ years is immediately to exercise the CA rights granted by the DCO – to buy the land outright. Any major investor providing the £800+ million upfront to build-out Botley West will require some collateral. The best collateral of all is land; it's fixed and is not going anywhere; and – as Mark Twain pointed out - they're not making any more of it.

Cleve Hill provides a useful precedent here. Its own DCO submission used more or less the same words as do the present applicants in requesting CA powers. Its November 2018 document (Cleve Hill Solar Park. Statement of Reasons. November 2018 Revision A) states:

“Whilst land, rights and interests required for the Project will be secured by agreement wherever possible, and negotiations continue with all identified owners, it is essential that compulsory acquisition powers are available to CHSPL (Cleve Hill Solar Park Ltd) to enable the Project to proceed at the earliest opportunity to enable the Project to contribute to the UK’s energy supply.”

The condition for the loan by Lloyds, Santander and Quinbrook who financed the building-out of Cleve Hill was that the land should be held freehold. Quinbrook now owns the entire project.

The same thing is likely to happen in the case of Botley West and I wonder just how much the current landowner is aware of the racing certainty that he – and more importantly the Blenheim Estate and the UNESCO World heritage site - will lose ownership of c. 1400 hectares of Oxfordshire countryside forever. The UK part of Island Green Power and its current owners, Australian Bank Macquarie, are likely to adopt an equally hard-nosed approach, as did Quinbrook, in their current hoovering up of a number of UK solar projects.

Another example of dissembling concerns the actual performance of Botley West. Despite its stated size – in terms of hectares occupied - changing over the last few months, two constants remain. The installed solar capacity of Botley West was 1307MWp in November of last year (2024) and is still 1307MWp in September of this. It seems Botley West can lose 100 hectares of land without changing its installed capacity. Second, we hear continuously about Botley West delivering 840MWe of ‘clean energy’ to the grid. In the first oral hearings I showed that Botley West will never deliver more than an average of 627MW – near mid-day in July (**REP1-169**). Yes, this is an average and yes there are occasions – some days in some Julys - when output will reach and even exceed 840MW. But the average - 627MW – is what we depend on in the long term. In December, that output falls to 217MW maximum (again at mid-day). That’s 1307MW of installed capacity producing no more than 217MW at mid-day in Winter. Botley West will never, ever average an output of 840MW in any hour of any day of the year. I challenge the applicants to prove otherwise. I do not dispute the annual total output of Botley West in terms of overall kWh, but there is a mismatch between the production profiles of UK solar farms and the UK household, and total, demand. To smooth out the solar supply to meet more of the demand, when it occurs, we need storage. The discussion during the Issue Specific Hearing 2 on 9th October 2025 about a possible BESS at Botley (an Ethos Green application, with a connection to the proposed new Botley substation, as recorded in NESO’s Transmission Energy Capacity, or TEC, register²) ended with the applicants saying *“This project does not require a battery to function”*. That

² [REDACTED]

is correct. Neither does an opera singer need an audience to function; but without one she is wasting her breath. Denying the need for local storage of electricity from a 1307MWp capacity installation shows the applicant has not considered the wider impact of Net Zero plans, and specifically how to deal with the intermittent output from renewable sources when demand is more or less continuous. The bind here is that, from the National Grid's point of view, Botley West really does need some sort of battery storage near, or on-site – to reduce the strain on the national grid of all solar installations across the nation sending maximum power across the grid at the same time – especially near mid-day in Summer. Instead, some of that power should be stored locally for distribution later, using batteries or other means. But, on the other hand, the cumulative impact of Botley West, plus a 250MW BESS, plus a new substation etc. etc may be an associated development too far for even the NSIP regime, thus threatening the chances of Botley West's approval.

I end by re-iterating a point made earlier to which the applicant has provided no response (**REP1-169**). The county's journey to Net Zero, as outlined in the Pathways to a Zero Carbon Oxfordshire (PAZCO) Report³, signed up to by all local District Councils, requires 728 – 868MW of solar capacity by 2030. In July of this year the Renewable Energy Planning Database⁴ records that Oxon had 1450MW of just ground-mounted solar in the development pipeline, including 849MW either already operational, under construction or awaiting construction (with a further 600MW submitted). That's 67% above the maximum PAZCO target, even without Botley West. Including Botley West takes that to more than three times the target figure.

In the case of renewable energy, too much of a 'good thing' becomes a 'bad thing', because over-capacity i) threatens the commercial viability of the renewable energy sector; ii) increases the level of subsidies paid to renewable energy companies (driving consumer prices up, not down) and iii) adversely affects the stability of the national electricity distribution system, increasing the likelihood of blackouts of the sort experienced in the Iberian peninsula in April 2025.

At some stage, someone has to say 'No' to yet more solar over-capacity, both nationally and locally.

David Rogers

20/10/25

³ [REDACTED]

⁴ <https://www.gov.uk/government/publications/renewable-energy-planning-database-monthly-extract>